

# EXHIBIT

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

\* \* \* \* \*

THE CITY OF HUNTINGTON,

Plaintiff,

vs.

CIVIL ACTION  
NO. 3:17-01362

AMERISOURCEBERGEN DRUG  
CORPORATION, et al.,  
Defendants.

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CABELL COUNTY COMMISSION,  
Plaintiff,

vs.

CIVIL ACTION  
NO. 3:17-01665

AMERISOURCEBERGEN DRUG  
CORPORATION, et al.,  
  
Defendants.

\* \* \* \* \*

Videotaped and videoconference deposition  
of CONNIE PRIDDY taken by the Defendants under the  
Federal Rules of Civil Procedure in the above-  
entitled action, pursuant to notice, before Teresa  
S. Evans, a Registered Merit Reporter, at the  
Mountain Health Arena, One Civic Center Plaza,  
Huntington, West Virginia, on the 13th day of July,  
2020.

1 heroin, I thought, "There is no way that is  
2 happening, because people don't use heroin."

3 And then I realized that the brain  
4 science behind it, once you are addicted to an  
5 opioid and your source dries up, that you are going  
6 to use something that's much more readily  
7 available.

8 So that was probably in 2005 to 2010.

9 Q. Had there been heroin usage in Huntington  
10 and Cabell County before 2005 or 2010?

11 A. Not that I was aware of. But I certainly  
12 wasn't on the front lines, because I was flying on  
13 the helicopter.

14 Q. So whether it was happening or not  
15 happening, you just --

16 A. Exactly.

17 Q. -- don't know. Do you know of any  
18 statistics that are kept about what drug a person  
19 starts using -- you know, you just made the comment  
20 about the source of opioids dries up and somebody  
21 goes to heroin.

22 Do you know of any statistics that  
23 would tell us what drug a person starts on?

24 A. And this is just from the experience of

1 working with the Quick Response Team. They -- once  
2 they establish a relationship with an individual,  
3 they will ask questions like that, and they have  
4 asked questions like that.

5 I'd say 70 or 80 percent of people say  
6 they started with pills.

7 Q. Is that data -- are those responses  
8 recorded anywhere?

9 A. We don't use that as a data point, so I  
10 could not say that it may not be in a narrative  
11 somewhere, but it is not a data point that we have  
12 --

13 Q. So that's not a --

14 A. It would be a good data point, but no, we  
15 have not --

16 Q. - it's not tracked.

17 A. -- collected it as a data point.

18 Q. So what's the source of your statement that  
19 70 to 80 percent of people start on pills?

20 A. From the Quick Response Team and their  
21 experience.

22 Q. So that's information that has been told to  
23 you by people on the Quick Response Team?

24 A. Absolutely, yes.

1 Q. Do you have any firsthand knowledge of that  
2 70 to 80 percent?

3 A. I do not.

4 Q. When did you first become involved in  
5 efforts to address opioid problems? Would that be  
6 -- I think you said 2016?

7 A. That was the first time I was asked to be  
8 on a task force. That does not mean that was the  
9 first time things were going on in Huntington, but  
10 that was the first time I was asked to be on the  
11 task force.

12 Q. And was that your first -- when was your  
13 first involvement in addressing opioid abuse  
14 issues? Was that when you went on that task force  
15 or before?

16 A. Oh, before. Based on the fact that I was  
17 collecting data for Cabell County EMS and I had put  
18 the drop-down box -- or had put -- I would never  
19 say I put it in there, because I'm not nearly  
20 technical. But I had that drop-down box put in for  
21 suspected overdose, and that was late 2014.

22 So I was certainly more involved than I  
23 was -- but 2016 was when on a community response, I  
24 was involved, so --